

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official  
capacity as President of the United States of  
America, et al.,

Defendants.

NO.

DECLARATION OF R.T.

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ATTORNEY GENERAL OF WASHINGTON  
Complex Litigation Division  
800 Fifth Avenue, Suite 2000  
Seattle, WA 98104  
(206) 464-7744

1 I, R.T., declare as follows:

2 1. I am over the age of 18, competent to testify as to the matters herein, and make  
3 this declaration based on my personal knowledge.

4 2. I live in Tacoma, Washington with my husband of 21 years and our three children,  
5 ages 18, 14, and 10.

6 3. I work in the administrative office of a public elementary school and my husband  
7 works in the private sector.

8 4. I have chosen to use my initials and refer to my three children as “Child A”,  
9 “Child B”, and “Child C” because I am fearful for my family’s safety due to the heightened anti-  
10 trans rhetoric in the current political environment.

11 5. Child A, my oldest, assigned male at birth, identifies as non-binary and uses  
12 they/them pronouns.

13 6. Child B, my middle child, assigned male at birth, identifies as transgender female  
14 and uses she/her pronouns.

15 7. Child C, my youngest, assigned female at birth, identifies as transgender male  
16 and uses he/they pronouns.

17 8. My oldest, Child A, came out as non-binary in the seventh grade and began using  
18 they/them pronouns. My husband and I were very supportive and began sharing this with family,  
19 friends, and trusted community members. When Child A was ready, we notified Child A’s school  
20 of their preferred name and preferred pronouns. Child A is now 18 years old and about to  
21 graduate high school. They have been accepted to Pacific Lutheran University to study nursing  
22 and couldn’t be more excited about what the future holds for them.

23 9. When Child B was in sixth grade, she started thinking that she was non-binary,  
24 but after about a year, she realized non-binary did not feel right to her, and that she’s actually  
25 transfemme. In the seventh grade, Child B started socially transitioning, using her new chosen  
26 name and she/her pronouns.

10. Midway through seventh grade, Child B was physically assaulted. A student grabbed her from behind and strangled her. The attack was interrupted by another student who happened upon them. Child B was deeply traumatized, and her mental health drastically deteriorated. One night after the attack, around 11 p.m., Child B came downstairs and told me she was really scared. She said she wasn't in a good place and was thinking about drinking bleach. She said she had been having suicidal ideation for some time. We immediately took her to the emergency room where they kept her overnight for observation. As a parent, I can't begin to explain how completely heartbreaking this was for our family. My sweet, loving child was suicidal, and she had a plan. We were unable to find an inpatient program for her after, so she started getting outpatient treatment. Recently we found her a psychiatrist with whom she'll have her first appointment this week.

11. After the attack, we did not feel Child B was getting the support she needed at her school, so she finished the remainder of the school year with the district's online program. The following school year we switched Child B to a smaller K-8 Montessori school in our district which was a much more supportive and gender-affirming environment. We immediately began to see a positive shift in her mental health. She was feeling more confident again. She was advocating for herself and her fellow students.

12. About a year ago, Child B started her medical transitioning with puberty blockers. She will soon begin taking estrogen. She is doing incredibly well in high school. She has good grades and is affirmed and respected by her peers for who she is. Child B feels like she is on the right path for the life she wants for herself and has truly come a long way from where she was just a few short years ago.

13. Our youngest, Child C, began puberty early. In kindergarten, he started developing breast tissue. When he was in second grade, Child C began exploring whether he might be non-binary. By the end of third grade, he discovered he identified more as transmasculine. Child C struggled a lot in school while working through his gender identity. He

1 experienced a lot of anxiety. Child C started seeing a therapist and was prescribed anti-anxiety  
2 medication by his pediatrician.

3 14. Once Child C realized he was transmasculine, Child C was ready to share his  
4 preferred pronouns with his classmates right away. Knowing we would be transferring Child C  
5 to the same Montessori school Child B went to, I suggested he start his social transition when he  
6 changed schools. But Child C did not want to wait. I describe it like trying on clothes. You're  
7 looking for that outfit that feels amazing when you put it on, and when you find it, you never  
8 want to take it off. As soon as Child C settled into his true identity, he felt incredible. We made  
9 clear he had our support.

10 15. Unfortunately, Child C also experienced an immediate loss of friends. The  
11 counselor he was seeing, a licensed mental health counselor (LMHC) that came to campus, was  
12 not being gender-affirming and kept misgendering Child C, so Child C decided to take a break  
13 from counseling. He still does not feel comfortable enough to trust and open up to another  
14 counselor after that first experience, but we are hoping that will change with time. We have  
15 Child C on waiting lists for therapists that specialize in gender-affirming care but due to there  
16 being so few, we haven't been able to find one that is currently accepting new patients, so that  
17 has been a struggle as well.

18 16. Child C started his period in the third grade. His pediatrician put him on a  
19 menstrual blocker. While the menstrual blockers have helped, Child C still experiences  
20 breakthrough bleeding. Those days are very traumatic for Child C. It compounds the emotional  
21 conflict of feeling miserable in his body and makes his struggle with gender dysphoria  
22 significantly worse.

23 17. Child C cannot start hormone replacement therapy yet due to his age. In the  
24 meantime, his body continues to develop. In our family, large breasts are normal and if Child C  
25 is not able to get puberty blockers, his breasts will get larger. He will have to continue binding  
26 his chest, but that is not healthy long term.

1           18. If the Executive Order were to stand, the consequences would be detrimental to  
2 my three children. They have all already faced so many struggles and obstacles before they came  
3 into themselves. They struggled with gender dysphoria, have constant nightmares, been verbally  
4 and physically attacked, suffered severe depression and anxiety, self-harm, missed a significant  
5 amount of school (which in turn required my husband and I to miss a significant amount of  
6 work), and the list goes on. The thing that has helped my children through their journeys, along  
7 with the love and support of their family, is gender-affirming care. I'm concerned about what  
8 being denied hormone treatment would do to Child B and Child C's mental health. My bigger  
9 concern is that if they are denied puberty blockers, their puberty will resume. Child B's voice  
10 would deepen, she would grow facial hair, an Adams Apple, and all her softened facial features  
11 would become masculine. Child C's breasts would grow, and he would develop female  
12 characteristics. I worry for both of them that this will do permanent harm and fear they'll fall  
13 into deep mental health crises.

14           19. Gender-affirming care has been absolutely vital to my children's well-being. The  
15 thought of this lifesaving care being taken away is terrifying. Their hope for the future would be  
16 stripped away. My husband and I have been researching alternatives for ways we can continue  
17 to support our children and get them the gender-affirming care they need if this Executive Order  
18 stands, but we are scared. We are scared for the safety of our children. We are scared for what  
19 this means for their future. And we can't help but be frightened when we see some states trying  
20 to take kids away from parents because they are gender-affirming.

21           20. We are determined to do everything we can to protect them. We have been safety  
22 planning and rehearsing what to do in different situations where they may be harassed or  
23 threatened. I have completely started over on social media accounts so that the only people who  
24 can see my posts are safe for my children. Child B has started carrying pepper spray.

25           21. I am grateful that the Washington Attorney General's Office is bringing this  
26 lawsuit, they are doing what I am unable to do as an individual. We do not have the financial

1 means to fight against a government of oligarchs. Any resources that we have, or other families  
2 like us have, would be miniscule compared to their endless money and resources. I also fear for  
3 the safety of my family if our identities were to be made public. I just want to keep my children  
4 safe as they try to navigate through an increasingly hostile world.

5 I declare under penalty of perjury under the laws of the State of Washington and the  
6 United States of America that the foregoing is true and correct.

7 DATED this \_\_\_\_ day of February 2025, at \_\_\_\_\_, Washington.

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R.T.

10 Parent of Child A, Child B, and Child C  
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7 DATED this 4 day of February 2025, at Tacoma, Washington.

8 R.T.

9 R.T.

10 Parent of Child A, Child B, and Child C  
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